
1992 Wis Eth Bd 11

LOBBYING

Two organizations jointly lobbying under a different name should continue to report separately the time and resources expended in lobbying by each organization. OEB 92-11

January 9, 1992

Facts

- [1] This letter is based upon these understandings:
- a. Two associations are engaged in a joint lobbying effort under a different name.
 - b. Each organization has a licensed lobbyist on staff.
 - c. Both organizations have pooled resources to pay your salary and expenses as a lobbyist for both organizations.

Question

- [2] The Ethics Board understands your question to be:

How should the organizations report lobbying time?

Discussion

[3] As you know, the lobbying law imposes certain registration and reporting requirements on every organization that meets the definition of a "principal." A principal is any organization that "employs a lobbyist." Section 13.62(12), *Wisconsin Statutes*. Because each organization pays a lobbyist to lobby on its behalf, each association must continue to be registered and report as a principal under the lobbying law. Moreover, each organization should report its own expenditures relating to lobbying as well as the time spent on lobbying by its own employees and lobbyists. Because you lobby for both organizations simultaneously, you should provide each association with the lobbyist's portion of the Principal's Statement of Lobbying Activities and Expenditures (blue jacket), accounting for your time spent lobbying. Since both logs will show the same entries, you may want to include an explanatory note on your logs indicating that they reflect time jointly reported for both organizations.

[4] Finally, we see no problem with the organizations presenting themselves under a different name as long as reference also is made to the fact that that alliance consists of both organizations.

Advice

[5] Both organizations should continue to report the time of their employees and the resources they expend in lobbying.